

## FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463.

Robert E. Gleasen, Treasurer
International Longshoremen's Association
AFL-CIO Committee on Political
Education
17 Battery Place
New York, NY 10004

DEC 2 2 1999

Identification Number:

C00158576

Reference:

Mid-Year Report (1/1/99-6/30/99)

Dear Mr. Gleasen:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule A of your report (pertinent portion(s) attached) discloses receipts from Marine Midland Bank. 2 U.S.C. §441b prohibits the receipt of funds from national banks, corporations, and labor organizations. Under 11 CFR §102.6, however, certain entities may serve as collecting agents for the purposes of transmitting contributions to a separate segregated fund. Please clarify the nature and purpose of these receipts and amend your report accordingly.

-Schedule B of your report (pertinent portion(s) attached) discloses a contribution(s) which appears to exceed the limits set forth in the Act. 2 U.S.C. §441a(a) precludes a committee from making contributions to another political committee and its affiliates in excess of \$5,000 per calendar year.

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information. If you have made an excessive contribution, you should notify the recipient and request a refund of the amount in excess of \$5,000.

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of the refund request sent to the recipient

committee(s). In addition, any refunds should be disclosed on Schedule A supporting Line 16 of the report covering the period during which they are received.

Although the Commission may take further legal action regarding the excessive contribution(s), your prompt action in obtaining a refund and/or redesignating the contribution(s) will be taken into consideration.

-For future reporting, please be advised that only contributions to federal candidates and political committees should be itemized on a separate Schedule B supporting Line 23 of the Detailed Summary Page. Contributions to non-federal candidates and committees should be itemized on Schedule B supporting Line 29.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 694-1130.

Sincerely

Scott Walker

Reports Analyst

Report Analysis Division

| SCHEDULE A ITEMIZE   | D RECEIPTS   | Use separate schedulc(s) for each calegory of the              | 3/17  |
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|  |  | FOR LINE NUMBER<br>11A1  |   |
| Any information copied from such Reports and Statements may necessarial purposes, other than using the name and address of a | at be sold or used by any person for the any political committee to solicit contri | he purpose of soliciting contri<br>buttoms from such committee | butions or far  |
| NAME OF COMMITTEE (In Full) INTERNATIONAL LONGSHOREMEN'S ASSOCIATION (ILA-CO)  | IATION AFL-CIÓ COMMITTI  | EE ON POLITICAL ED   | DUCATION  |
| Full Name, Meiling Address, and ZIP Code MARINE MIDLAND BANK 17 BATTERY PLACE [MEMO ITEM]                                    | Name of Employer   | Date (month, day, year)<br>01/25/1999                          | Amount of Each<br>Receipt this Period<br>47269.52<br>eck-off contributions  |
| NEW YORK NY 16004  Receipt For: Primary General  | Cocupation   |  |   |
| Receipt For: Primary General  Other (specify) :  | Aggregate Year-to-Date > \$  | 0.00   |   |
| Full Name, Mailing Address, and ZIP Code<br>MARINE NIDLAND BANK<br>17 BATTERY PLACE  | Name of Employer   | Date (month, day, year)<br>61/25/1999                          | Amount of Each<br>Receipt this Period<br>47259.62<br>eck-off contributions  |
| NEW YORK NY 10004  Receipt For: Primary General  | Occupation   |  |   |
| Receipt For: Primary General   | Aggregate Year-to-Date > 5   | 47269.62   |   |
| Full Name, Malling Address, and ZIP Code<br>MARINE MIDLAND BANK<br>17 BATTERY PLACE  | Name of Employer   | Date (month,<br>day, year)<br>02/22/1999<br>Ci                 | Amount of Each Receipt this Period 83864.80                                 |
| NEW YORK NY 10004  Receive For: Primary General  | Occupation   |  |   |
| Receipt For: Primary General Other (specify):  | Aggregate Year-to-Date > 5   | 131154.52  | <u> </u>  |
| Full Name, Majling Address, and ZIP Code  MARINE MICLAND BANK  17 BATTERY PLACE  | Name of Employer   | Date (month, day, year)<br>03/23/1989<br>C                     | Amount of Each<br>Receipt this Period<br>63309.61<br>reck-off contributions |
| NEW YORK NY 19994  | Occupation   |  |   |
| Receipt For: Primary General Other (specify):  | Aggregate Year-to-Date > 5   | 194454.13  | <u> </u>  |
| Full Name, Mailing Address, and ZIP Gode  MARINE MIDLAND BANK  17 BATTERY PLACE  | Name of Employer   | Date (month,<br>day, year)<br>04/26/1999                       | Amount of Each<br>Receipt this Period<br>43787.50<br>Feck-off contributions |
| NEW YORK NY 10004  | Occupation   |  |   |
| Receipt For: Primary General Other (specify):  | Aggregate Year-to-Date > \$  | 236251.63  | <u></u>   |
| Full Name, MaRing Address, and ZIP Code<br>MARINE MIDLAND BANK<br>17 BATTERY PLACE   | Name of Employer   | Date (month, day, yeer)<br>05/25/1999                          | Amount of Each<br>Receipt this Period<br>45756.19                           |

Occupation

SUBTOTALSof Receipts This Page (Optional)

TOTALS This Period (last page this line number only) ......

Apgragate Year-to-Date > 6

265017.82

285017.82

NY 10004

Primary

General

NEW YORK

Other (specify) :

Receipt For:



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## 14 / 17 SCHEDULE B ITEMIZED DISBURSEMENTS Use separate schedule(s) for each category of the ---FOR LINE NUMBER Detailed Summary Page 23 Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soldtling contributions or for commercial purposes, other then using the name and address of any political committee to solicit confidulions from such committee. NAME OF COMMITTEE (In Full) NTERNATIONAL LONGSHOREMEN'S ASSOCIATION AFL-CIO COMMITTEE ON POLITICAL EDUCATION LA-CO Amount of Each Full Name, Mailing Address, and ZIP Code Purpose of Disbursement Date (month, Disbursement This day, year) MIKE MOSTEIT CAMPAIGN Period 9611 BLUEBIRD 04/15/1999 LaPorte City Council 500.00 Disbursement for: Primary X General LA PORTÉ TX 77571 Other (specify): Amount of Each Disbursement This Full Name, Mailing Address, and ZIP Code Purpose of Distursement Dele (month, day, year) MILLER FOR SENATE Period P.O. BOX 452 DB/17/1999 3000,00 Primary X General VA 23501 Disbursament for: NORFOLK Other (spedify): Amount of Each Full Name, Mailing Address, and ZIP Code Purpose of Disbursement Deta ámorth. Disbursement This day, year) JOHN JOSEPH MOAKLEY (House - MA - 09) Pariori 1812 COLUMBIA ROAD 02/03/1999 1500.D0 Disburgament for: X Primary General MA 02127 **BOSTON** Other (specify): Date (month, Amount of Each Purpose of Disbursement Full Name, Mailing Address, and DP Code Distursement This day, year) NEW JERSEY DEMOCRATIC STATE COMMITTEE Period 3000.00 150 WEST STATE STREET 02/24/1999 Disbursement for. X Primary General NJ 03608 TRENTON Other (specify): Amount of Each Disbursement Tires Purpose of Disbursement Date (month, Full Name, Mailing Address, and ZIP Code day, year) NEW JERSEY DEMOCRATIC STATE COMMITTEE Period 03/02/1989 3000.00 150 WEST STATE STREET Dispursement for: X Primary | General NJ 08808 TRENTON Other (spedily): A<del>moint of Earl</del>t Purpose of Distursement Date (month, Full Name, Making Address, and ZIP Code Disbursement This day, year) NEW YORK STATE DEMOCRATIC SENATE CAMPAIGN COMMITTEE Period 03/08/1999 107 WASHINGTON AVENUE 1200.00 Olsburgement for: Primary X General NV 12210 ALBANY Other (specify): Amount of Each Purpose of Disbursement Dete (month, Full Name, Mailing Address, and ZIP Code Disbursement This day, year) (House - MA - 01) JOHN W OLVER Period 1333 WEST STREET 05/05/1999 2500.00 P D BOX 28 Disbursement for: X Primery General AMHERST MA 01004 Other (specify): Amount of Each Distursement This Date (month, Full Name, Mailing Address, and ZIP Code Purpose of Disburstment day, year) (House - NJ - 06) PALLONE FOR CONGRESS Period 2500.00 08/02/1999 PD BOX 3178 Distorsement for: X Primary General LONG BRANCH NJ 07740 Other (specify): Amount of Each Full Name, Matting Address, and ZIP Code Purpose of Disbursement Date (month.) Districts and This day, year) (House - NJ - 08) PASCRELL FOR CONGRESS Period 63 QUARTZ LANE 1000.00 03/08/1998 Disbursement for: X Primary NJ 07501 PATERSON Other (specify): SUBTOTALS of Disbursements This Page (Optional) ...... TOTALS This Period (last page this line number only) ......